Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at http://about.jstor.org/participate-jstor/individuals/early-journal-content.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

In Bandfield *v.* Bandfield, 117 Mich. 80, 75 N. W. 287, 40 L. R. A. 757, 72 Am. St. Rep. 550, where the husband communicated to his wife a loathsome disease, the court denied her right to sue, and said that: "In the absence of an express statute, there is no right to maintain an action at law for such wrong. We are cited to no authority holding the contrary. We cite a few sustaining the rule: Abbott *v.* Abbott, 67 Me. 304, 24 Am. Rep. 27; Freethy *v.* Freethy, 42 Barb. 641; Peters *v.* Peters, 42 Iowa, 182; Schultz *v.* Schultz, 89 N. Y. 644; Cooley, Torts (2d Ed.) p. 268; Schouler, Dom. Rel. p. 252; Newell, Defamation, p. 366; Townshend, Slander and Libel (3d Ed.) p. 548."

Libel and Slander—Communication by Former Employer to Surety Company Held Privileged.—In Hoff *v.* Pure Oil Co., 179 N. W. 891, the Supreme Court of Minnesota held that a communication in the form of questions and answers concerning the standing of a former employee, to a party who by his authority requested it, is privileged, and is not a publication of any libel contained therein for which the law affords a remedy, in the absence of proof of express malice.

The court said in part: "It is well settled that proof of the truth of an alleged libel is a complete defense in a suit for damages, where no special damages are pleaded. Thompson *v.* Pioneer-Press, 37 Minn. 285, 33 N. W. 856. See note, 21 L. R. A. 504. See note, 50 L. R. A. (N. S.) 1040. See note, 31 L. R. A. (N. S.) 133; 25 Cyc. 413, and cases cited. * * * "A communication in the form of questions and answers concerning the standing of a former employee, to a party who by his authority requested it, in the absence of express malice, is privileged, and is not a publication of any libel contained therein for which the law affords a remedy. Railway Co. *v.* Delaney, 102 Tenn. 289, 52 S. W. 151, 45 L. R. A. 600; 25 Cyc. 392; Billings *v.* Fairbanks, 136 Mass. 177; Beeler *v.* Jackson, 64 Md. 589, 2 Atl. 916; Hebner *v.* G. N. Ry. Co., 78 Minn. 289, 80 N. W. 1128, 79 Am. St. Rep. 387. The inquiry and the reply thereto were in the nature of a confidential communication. They were so labeled and treated, so far as appears from the record. They were issued at the special instance of the plaintiff. The only publicity given the answers contained therein was in making them known to the Guarantee Company. The record presents no evidence sufficient to justify a finding of express malice. It follows that the defendants were entitled to a directed verdict."

Streets and Highways—Rights and Liabilities of Owner of Minerals under Highway.—In Breich *v.* Locus Mountain Coal Co., 110 Atlantic, 242, the Supreme Court of Pennsylvania held that one who owns a fee in minerals under the surface of a highway and mines on the surface adjacent thereto, may work such mines in such a way as not to